

Application No. 10/083,324

Docket No. CTX-079

**REMARKS**

Claims 1-68 were presented for examination and claims 1-68 are rejected. In the present amendment, claims 1, 33, 45, 51-52, and 57 have been amended. No new matter has been introduced. Upon entry of the present amendment, claims 1-68 will be currently pending in this application, of which claims 1, 23, 45, 67 and 68 are independent. Applicants submit that claims 1-68 are in condition for allowance.

The following comments address all stated grounds of rejection. Applicants respectfully traverse all rejections and urge the Examiner to pass the claims to allowance in view of the remarks set forth below.

**Drawing Objections**

The Examiner objects to the drawings under 37 CFR 1.83(a) for not showing every feature of the invention specified in the claims. The Examiner contends that the disabled ticket, the enabled ticket, and the step of enabling the disabled ticket are not shown in the Figures. Applicants respectfully traverse this objection.

Applicants submit that one ordinarily skilled in the art would have a proper understanding of a disabled ticket, an enabled ticket, and the step of enabling the disabling ticket as depicted by the Figures in view of the specification. Those ordinarily skilled in the art would appreciate and recognize that any of the tickets graphically represented in FIGs. 3 and 4B, such as the first ticket and the second ticket, may be disabled and then enabled via ticket validation in view of communications with the ticket authority (225, FIGs. 2B and 4A of this application) as described in the corresponding detailed description sections of the specification (see paragraphs 37-41 and 56-59 of this application). As such, Applicants contend that further detailed

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illustration of these features in the Figures is not essential for a proper understanding of the invention.

For at least the aforementioned reasons, Applicants respectfully submit that corrections to the drawings are not required to show the features cited by the Examiner in the objection. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw the objection to the drawings.

### **CLAIM REJECTIONS UNDER 35 USC §112**

Claims 3, 5, 7-13, 33-37, 51-52 and 57-61 are rejected under 35 U.S.C. §112, second paragraph, as not particularly pointing out and distinctly claiming the subject matter which the Applicants regard as their invention. Applicants respectfully traverse this rejection and submit that claims 3, 5, 7-13, 33-37, 51-52 and 57-61, as amended, particularly point out and distinctly claim the invention.

The Examiner indicates that claims 3, 5, and 7-13 recite the limitation "said ticket authority" without sufficient antecedent basis. Claims 3, 5, and 7-13 depend on and incorporate the patentable claim limitations of independent claim 1, which is hereby amended to recite a ticket authority, thereby correcting the antecedent deficiency in dependent claims 3, 5, and 7-11

The Examiner indicates that the limitation of a "a disabled second ticket" recited in claims 33-37 and 57-61 is unclear whether this is a disabled version of the second ticket of claim 23 or 45 or whether this is meant to be a different second ticket. Claims 34-37 depend on and incorporate the patentable limitations of claim 33, and claims 58-61 depend on and incorporate the patent limitations of claim 57. Applicants respectfully disagree with the Examiner that one

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ordinarily skilled in the art would be unable to determine the scope of these claims. Nevertheless, Applicants hereby amend claims 33 and 57 to recite "the second ticket is disabled."

The Examiner indicates that the limitation of a "said second ticket" recited in claims 51-52 is unclear whether this is referring to the "disabled second ticket" or the "enabled second ticket." Applicants respectfully disagree with the Examiner that one ordinarily skilled in the art would be unable to determine the scope of these claims. Nevertheless, Applicants hereby amend claims 51-52 to recite "said enabled second ticket."

In light of the aforementioned amendments, Applicants submit claims 3, 5, 7-13, 33-37, 51-52, and 57-61 particularly point out and distinctly claim the subject matter to which the Applicants regard as their invention. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 3, 5, 7-13, 33-37, 51-52, and 57-61 under 35 U.S.C. §112, second paragraph.

#### **CLAIM REJECTIONS UNDER 35 U.S.C. §102**

Claims 1-6, 10-19, 21, 23-28, 32-42, 44-52, 56-64 and 66-68 are rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent Application Publication No. 2003/0018913 to Brezak et al. ("Brezak"). Claims 1, 23, 45, 67, and 68 are independent claims. Claims 2-6, 10-19, and 21 depend on and incorporate all the patentable subject matter of independent claim 1. Claims 24-28, 32-42 and 44 depend on and incorporate all the patentable subject matter of independent claim 23. Claims 46-52, 56-64, and 66 depend on and incorporate all the patentable subject matter of independent claim 45. Applicants respectfully traverse this rejection and submit that Brezak fails to disclose each and every element recited in claims 1-6, 10-19, 21, 23-28, 32-42, 44-52, 56-64 and 66-68.

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A. Independent Claims 1, 23, 45, and 68 Patentably Distinguished over Brezak

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Amended independent claims 1 is a method, and independent claim 23 and amended independent claims 45 and 68 are systems for authenticating a client to a content server. These independent claims are directed towards a ticket authority generating a ticket associated with a client and having a first ticket and a second ticket. For example, independent claims 1 and 68 recite generating, by a ticket authority, a ticket associated with the client, the ticket comprising a first ticket and a second ticket. Also, independent claims 23 and 45 recite a ticket authority generating a ticket associated with the client, the ticket comprising a first ticket and a second ticket.

Brezak does not disclose generating by a ticket authority a ticket associated with the client and comprising a first ticket and a second ticket. Instead, Brezak discusses generating single tickets for the client. In response to a user logging on at a client, the authentication service of Brezak generates a ticket generating ticket for the user/client (see paragraph 43, Brezak). When the client wants to access the server, the client in Brezak sends a ticket granting request to the authentication service and receives a service ticket associated with the client and server (see paragraph 44, Brezak). Neither the ticket generating ticket nor the service ticket associated with the client of Brezak includes a first ticket and a second ticket. Rather, the ticket generating ticket and service ticket of the client are single tickets. As such, the ticket generating service of Brezak does not generate a ticket having a first ticket and a second ticket. Thus, Brezak fails to disclose generating by a ticket authority a ticket associated with the client and comprising a first ticket and a second ticket.

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For at least the above-discussed reasons, Brezak fails to disclose each and every feature of independent claim 1. Claims 2-6, 10-19, and 21 depend on and incorporate all the patentable subject matter of independent claim 1. Claims 24-28, 32-42, and 44 depend on and incorporate all the patentable subject matter of independent claim 23. Claims 46-52, 56-64, and 66 depend on and incorporate all the patentable subject matter of independent claim 45. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 1-6, 10-19, 21, 23-28, 32-42, 44-52, 56-64, 66, and 68 under 35 U.S.C. §102.

**B. Independent Claim 67 Patentably Distinguished over Brezak**

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Independent claim 67 is directed towards a system for authenticating a user. The system includes a client, a first ticket authority, a second ticket authority, a content server, and a content server proxy in communication with the client, the first ticket authority, and the content server. The first ticket authority generates a first ticket associated with the client, and the second ticket authority generates a second ticket associated with the content server. The first ticket is transmitted to the client and used to establish a first communication session with the content server proxy, and the second ticket is transmitted to the content server proxy and used to establish a second communication session with the content server.

Brezak does not disclose a first ticket authority generating a first ticket associated with the client, and a second ticket authority generating a second ticket associated with the content server. Rather, Brezak discusses using a single ticket authority for generating a first ticket associated with the client and a second ticket associated with the content server. Furthermore,

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Brezak teaches away from using a second ticket authority as Brezak indicates copying information carried in a client ticket is more efficient than using a database (see paragraph 58, Brezak). In contrast, the first ticket authority of the claimed invention generates a client ticket while the second ticket authority of the claimed invention generates a content server proxy ticket. Thus, Brezak fails to disclose a first ticket authority generating a first ticket associated with the client, and a second ticket authority generating a second ticket associated with the content server.

For at least the above-discussed reasons, Brezak fails to disclose each and every feature of independent claim 67. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claim 67 under 35 U.S.C. §102.

#### **CLAIM REJECTIONS UNDER 35 U.S.C. §103**

Claims 20, 22, 43, and 65 are rejected under 35 U.S.C. §103 as unpatentable over Brezak. Claims 20, 22, 43, and 65 are rejected under 35 U.S.C. §103 as unpatentable over Brezak in view of U.S. Patent Application Publication No. 2003/0233554 to Litai et al. ("Litai"). Claims 7-9, 20, and 22 depend on and incorporate all the patentable subject matter of independent claim 1. Claims 29-31 and 43 depend on and incorporate all the patentable subject matter of independent claim 23. Claims 53-55 and 65 depend on and incorporate all the patentable subject matter of independent claim 45. Applicants respectfully traverse this rejection and submit that Brezak in view of Litai, alone or in combination, fails to teach or suggest each and every element recited in claims 7-9, 20, 22, 29-31, 43, 53-55, and 65.

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C. Claims Dependent from Patentable Independent Claims 1, 23, and 45

For the reasons discussed above in connection with the rejection of the independent claims 1, 23 and 45, Applicant submits independent claims 1, 23, and 45 are patentable and in condition for allowance. Thus, claims dependent from claims 1, 23, and 45 are patentable and in condition for allowance. As such, Applicants submit dependent claims 7-9, 20, 22, 29-31, 43, 53-55, and 65 are patentable and in condition for allowance.

In the Office Action, the Examiner admits that Brezak does not disclose the content server verifying the ticket. The Examiner cites Litai in the Office Action only to suggest one ordinarily skilled in the art might modify Brezak to have the content server verify the ticket. However, as with Brezak, Litai does not disclose, teach or suggest generating a ticket associated with the client that includes a first ticket and a second ticket. Therefore, Brezak in view of Litai fails to teach or suggest each and every feature of the claimed invention.

Because Brezak in view of Litai, alone or in combination, fails to detract from the patentability of the claimed invention, Applicants submit dependent claims 7-9, 20, 22, 29-31, 43, 53-55, and 65 are patentable and in condition for allowance. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 7-9, 20, 22, 29-31, 43, 53-55, and 65 under 35 U.S.C. §103.

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**CONCLUSION**


In light of the aforementioned arguments, Applicants contend that each of the Examiners' rejections has been adequately addressed and all of the pending claims are in condition for allowance. Accordingly, Applicants respectfully request reconsideration, withdrawal of all grounds of rejection, and allowance of all of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' attorney would expedite prosecution of this application, the Examiner is urged to contact the Applicants' attorney at the telephone number identified below.

Respectfully submitted,

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Dated: December 7, 2005

  
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